Office of Emergency Communications
National Protection and Programs Directorate
U.S. Department of Homeland Security
Washington, DC 20528

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VIA ELECTRONIC FILING
Marlene H. Dortch,
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

NOTICE OF EX-PARTE COMMUNICATIONS
Public Safety and Homeland Security Bureau Seeks Comment on Response Efforts Undertaken During 2017 Hurricane Season; PS Docket No. 17-344

Dear Ms. Dortch:

On behalf of the Department of Homeland Security's Office of Emergency Communications (OEC), we hereby submit a written *ex parte* communication on the effectiveness of priority telecommunications services during the 2017 Hurricane Season.

The U.S. Department of Homeland Security (DHS) is charged with supporting the Federal, State, local, tribal and territorial governments and the private sector to prepare for, respond to, and manage the consequences of all hazards and threats to our nation. A successful response to an emergency—whether a routine public safety incident or a Presidentially-declared disaster—requires the communication of critical information among a variety of stakeholders, including government officials, emergency response providers, and the private sector. The OEC is the Federal lead in providing and managing priority telecommunications services programs to support national security and emergency preparedness (NS/EP) communications. The OEC develops services and manages programs in conjunction with industry partners to provide communications capabilities used by government officials and emergency responders to keep America safe, secure and resilient. These capabilities allow authorized personnel to continue to communicate at all times and under all circumstances to carry out our nation's most critical and time sensitive missions.

PRIORITY TELECOMMUNICATIONS SERVICES

The establishment of national security and emergency preparedness (NS/EP) communications was directed by the White House in national policy and requirements over 30 years ago. Two of the priority telecommunications services established to meet NS/EP

communications requirements: Government Emergency Telecommunications Service (GETS) and Wireless Priority Service (WPS), are maintained in a constant state of readiness for use in an emergency or crisis situation when the public telephone networks are congested and the probability of completing a normal call is reduced. GETS improves call completion over public wireline networks and WPS improves call completion over public wireless networks. A third priority telecommunications service, Telecommunications Service Priority (TSP), enables telecommunications carriers to prioritize the restoration, recovery, and installation of critical circuits and voice capabilities.

Government Emergency Telecommunication Service (GETS)

GETS improves the probability of call completion over public wireline telephone networks during emergencies when congestion may arise due to increased call volumes and/or damage to communications infrastructure. GETS priority features have been implemented on both local and long distance wireline networks. GETS is an easy-to-use calling card service that is accessible nationwide and from most international locations. To access GETS, users dial a universal access number (710-NCS-GETS) using common telephone equipment and enter a personal identification number (PIN). Once authenticated, calls placed through GETS receive priority over normal calls. However, GETS calls do not preempt calls in progress or prevent the general public's use of the telephone network. GETS can be accessed through other government networks including the Defense Switched Network, GSA's Networx/EIS, and the Diplomatic Telecommunications Service. In more than 20 years of service, GETS has provided vital communications capabilities during numerous hurricanes, earthquakes, floods, and wildfires, the Oklahoma City Bombing and the 9-11 attacks. More information on GETS is available at www.dhs.gov/gets.

Wireless Priority Service (WPS)

The WPS is an add-on feature to cellular telephone subscriptions. WPS priority features have been implemented on all nationwide and several regional cellular service provider networks. WPS provides priority calling for authorized personnel when the cellular networks are congested and the probability of completing a call is reduced. In the event of wireless network congestion, an authorized user invokes the WPS service on a WPS-enabled phone by dialing ⁎272 prior to dialing the desired destination number. The WPS call receives priority over public calls when the wireless spectrum is congested; however, WPS calls do not preempt calls in progress. In more than 15 years of service, WPS has supported response and recovery operations during hurricanes, tornados and floods, and provided critical communications capabilities during the Boston Marathon Bombing. More information on WPS is available at www.dhs.gov/wps.

Telecommunications Service Priority (TSP)

The TSP Program authorizes NS/EP organizations to receive priority restoration and installation of vital voice and data circuits or other telecommunications services that may be damaged as a result of a natural or man-made disaster. Following a disaster, telecommunications service vendors frequently experience a surge in requests for new services and requirements to restore existing services. The TSP program provides service vendors an FCC mandate to prioritize requests by identifying those services critical to NS/EP missions. A TSP assignment to a service ensures that it will receive priority attention by the service vendor before any non-TSP service. More information on TSP is available at www.dhs.gov/tsp.

The OEC submits the following information on the effectiveness of priority telecommunications services during the 2017 Hurricane Season. The information is responsive in particular to PS Docket No. 17-344, Section *C. Questions Regarding Communications Service User Experience*, specifically Question 7. (repeated below for reference).

> *"The FCC oversees the National Security/Emergency Preparedness (NSEP) priority service programs which provide for service restoration and provisioning and mobile wireless and wireline priority. To what extent were the priority service programs effective? Did NSEP users receive improved performance (higher percentage of call completion) when using the Government Emergency Telecommunication Service (GETS) and Wireless Priority Services (WPS) compared to non-prioritized voice calls? If not, why not? Were GETS calling cards distributed across emergency responder organizations? Were emergency responder cell phones equipped with WPS? Are there any actions that the FCC could take to improve the effective use of the priority services programs?"*

To what extent were the priority service programs effective?

The OEC provided priority telecommunications services support to national leadership and first responders with a high rate of success during Hurricanes Harvey, Irma and Maria. For 32 consecutive days spanning August 25 through September 26, the OEC and their service providers provided constant vigil over the priority services, while assisting thousands of NS/EP users with expedited service activations. Despite the level of damage sustained, the performance levels of GETS, WPS and TSP were among the highest ever achieved during hurricanes. The OEC also supported priority services users during Hurricane Nate. However, due to the short duration of Nate, there were minimal support efforts and expedited activations were not necessary.

Hurricane Harvey

For Hurricane Harvey there was daily performance reporting from August 25 to September 4, 2017. There were 7,006 valid GETS calls made during Harvey that originated or terminated in the impacted Texas areas. Valid GETS calls are those calls with valid PINs and valid destination numbers. There were also thousands of GETS calls originated or terminated outside of the impacted areas of Hurricane Harvey. Many of these GETS calls were associated with the movement of response and recovery equipment, supplies, personnel and logistics in support of Harvey. These GETS calls were not included this performance report.

The GETS calls for the impacted areas of Hurricane Harvey included 323 user calls (138 landline and 185 wireless) and 6,683 test calls. The GETS user calls completed at a Call Completion Rate of 98 percent, and the GETS test calls completed at a Call Completion Rate of 99 percent. The GETS test calls were made by the GETS Integration Contractor and the GETS long distance service providers to ensure the availability and service readiness of the landline switches in Texas.

There were 796 valid WPS calls originated in the disaster areas. Valid WPS calls are those calls with a valid vertical service code (*272) and a valid destination number. These WPS calls included 280 user calls and 516 readiness/test calls, which completed at a Call Completion Rate of 98 percent. For Harvey, the OEC processed requests for 55 expedited GETS cards and 445 expedited WPS service activations, along with 146 emergency TSP provisioning requests.

Hurricane Irma

For Hurricane Irma there was daily performance reporting from September 5 to September 15, 2017. There were 3,719 valid GETS calls originated or terminated in the impacted Florida, Puerto Rico and U.S. Virgin Islands areas. These GETS calls included 1,624 user calls (1,087 landline and 537 wireless) and 2,095 test calls. There were also thousands of GETS calls originated or terminated outside of the impacted areas of Hurricane Irma. Many of these GETS calls were associated with the movement of response and recovery equipment, supplies, personnel and logistics in support of Irma. These GETS calls were not included this performance report.

The GETS user calls in the impacted areas of Hurricane Irma completed at a rate of 98 percent, and the GETS test calls completed at a Call Completion Rate of 99 percent. The GETS test calls were made by the GETS Integration Contractor and the GETS long distance service providers to ensure the availability and service readiness of the landline switches in the impacted areas.

There were 3,859 valid WPS calls originated in the disaster areas of Hurricane Irma, including 685 user calls and 3,174 readiness/test calls, which completed at a Call Completion Rate of 93 percent. For Irma, the OEC processed requests for 146 expedited GETS cards and 2,445 expedited WPS service activations—most of these within a few hours—along with 284 emergency TSP provisioning requests. This was the largest number of fulfilled expedited WPS service requests since Hurricane Katrina.

Hurricane Maria

For Hurricane Maria there was performance reporting from September 16 to September 26, 2017. There were 335 valid GETS calls originated or terminated in the impacted Puerto Rico and U.S. Virgin Islands areas. These GETS calls included 282 user calls (64 landline and 218 wireless) and 53 test calls. There were also thousands of GETS calls originated or terminated outside of the impacted areas of Hurricane Maria. Many of these GETS calls were associated with the movement of response and recovery equipment, supplies, personnel and logistics in support of Maria. These GETS calls were not included this performance report.

The GETS user calls completed at a Call Completion Rate of 90 percent. The GETS test calls were all originated from San Juan, Puerto Rico where there was electrical power available, and where the telecommunications gateway to the continental United States is located. These test calls assured that GETS calls could be routed from Puerto Rico to the continental United States to obtain GETS PIN authorization and normal GETS call processing. These calls completed at a Call Completion Rate of 99 percent.

There were 511 valid user WPS calls originated in the disaster areas which completed at a Call Completion Rate of 76 percent. There were no WPS test call units located in Puerto Rico or the U.S. Virgin Islands from which to originate readiness/test calls. During this time period the OEC processed requests for 17 expedited GETS cards and 80 expedited WPS service activations, along with 20 emergency TSP provisioning requests.

Hurricane Nate

For Hurricane Nate there was performance reporting from October 7 to October 8, 2017. Post-event analysis of Hurricane Nate indicates there was negligible network congestion present, and that there was only a small increase in NS/EP user call volume during the event. Additionally, there were no requests for expedited GETS cards or expedited WPS service activations, and there were no emergency TSP provisioning requests during Nate.

Did NSEP users receive improved performance (higher percentage of call completion) when using the Government Emergency Telecommunication Service (GETS) and Wireless Priority Services (WPS) compared to non-prioritized voice calls? If not, why not?

The OEC does not receive information on the performance of public (non-prioritized) voice calls. However, operational performance measurements collected within the telecommunications service provider networks along with testimonials provided by NS/EP users indicate that NS/EP users received improved performance using GETS and WPS as compared to public voice calls. In Texas during Hurricane Harvey NS/EP calls queued in landline switches due to congestion. And, during Hurricane Maria WPS calls queued in mobile switches for an outgoing trunk indicating the presence of significant congestion. Public calls do not queue for network resources, so GETS and WPS calls receive the benefit of improved performance in the presence of network congestion.

Additionally, post-Irma performance analysis shows that WPS users of the Verizon Wireless service in Florida benefited significantly from the WPS Enhanced Overload Performance (EOP) feature which activated due to network congestion. During Hurricane Irma, Verizon Wireless users were able to get a radio signaling channel in order to initiate their calls, while the public's chance of getting a signaling channel was sometimes less than 1 percent. The WPS EOP feature, available in Verizon Wireless, Sprint and U.S. Cellular networks, provides priority for signaling between the user's mobile device and the cell tower, along with call processing priority and priority for paging messages to terminating mobile devices. A similar priority signaling feature exists in AT&T Mobility networks.

Were GETS calling cards distributed across emergency responder organizations?

GETS cards were issued to many NS/EP organization personnel expected to have responded to the 2017 Atlantic Season hurricanes. Following a Katrina Panel recommendation (FCC 07-107, *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*) the OEC further expanded, publicized and promoted through outreach efforts the availability of priority services (GETS, WPS and TSP) to all eligible

entities, particularly eligible government, public safety, emergency medical community, and critical industry groups. An analysis was conducted of GETS and WPS for the seven states of Texas, Florida, Louisiana, Alabama, Georgia, South Carolina, and Mississippi and the two territories of Puerto Rico and U.S. Virgin Islands for which emergency or disaster declarations were made during the 2017 hurricane season. When looking at the number of organizations participating in the GETS and WPS programs, the analysis indicated that there was an increase in participation from 1,028 to 2,413 organizations from the time period just prior to Hurricane Katrina (August 2005) and just prior to Hurricane Harvey (August 2017). Correspondingly, the number of GETS cards distributed to organizations in these seven states and two territories had increased from 10,521 to 55,364 GETS cards over the same time period. The majority of organization and GETS card increases occurred in the local government and commercial/non-profit sectors. Additionally, the OEC processed requests for hundreds of expedited GETS cards in the run up to and during Hurricanes Harvey, Irma and Maria.

Were emergency responder cell phones equipped with WPS?

WPS enabled cell phones were subscribed to by many NS/EP organization personnel expected to have responded to the 2017 Atlantic Season hurricanes. As part of the analysis previously described, the number of WPS subscriptions in the seven states and two territories for which emergency or disaster declarations were made for the 2017 hurricane season realized an increase from 1,515 to 22,606 WPS subscriptions from the time period just prior to Hurricane Katrina (August 2005) and just prior to Hurricane Harvey (August 2017). The largest WPS subscription increase occurred in the Federal government sector. Additionally, the OEC processed requests for several thousand expedited WPS service activations in the run up to and during Hurricanes Harvey, Irma and Maria.

Are there any actions that the FCC could take to improve the effective use of the priority services programs?

The OEC recommends the FCC take action to update the FCC Second Report & Order (R&O) for Priority Access Service (PAS) [*now commonly known as the Wireless Priority Service (WPS)*] (FCC 00-242, WT Docket No. 96-86, *Establishment of Rules and Requirements For Priority Access Service,* dated July 13, 2000). To date, this FCC R&O has proven to be a beneficial set of rules and regulations in enabling a wireless priority service to be developed, and in authorizing CMRS operators to offer priority services to national leadership and public safety personnel to meet NS/EP mission needs. However, since issuance of the R&O, industry has continued to evolve their wireless network capabilities and new NS/EP policy and requirements for priority voice, video, data and information services have been issued. Therefore, it is highly recommended that the FCC take immediate action to update the R&O to address the rules and regulatory needs in order for industry to provide these enhanced mission critical communications services. This is expected to significantly improve the effective use of NS/EP priority services.

We appreciate this opportunity to share information with the FCC. Please do not hesitate to contact the undersigned if you require further input.

Respectfully submitted,

Ronald T. Hewitt
Director
Office of Emergency Communications